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Attorneys for Plaintiff

UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
EUGENE DIVISION

NICOLE GILLILLAND, AN INDIVIDUAL,

Case No. 6:19-cv-00283-MK

Plaintiff,

vs.

**SOUTHWESTERN OREGON
 COMMUNITY COLLEGE DISTRICT BY
 AND THROUGH ITS BOARD OF
 EDUCATION, AN OREGON COMMUNITY
 COLLEGE DISTRICT AND BOARD;
 SOUTHWESTERN OREGON
 COMMUNITY COLLEGE, AN OREGON
 COMMUNITY COLLEGE,**

Defendants.

PLAINTIFF'S WITNESS LIST

Witness	Topics	Time
Will Call		
Nicole Gililland (she/her)	Plaintiff will testify about the events and facts supporting her claims, consistent with her deposition testimony, and about the damages and injuries she suffered from Defendants' actions and omissions, as well as her mitigation of damages	6 hours
Stephanie Kyelberg (she/her)	She is expected to testify consistently with her declaration	1 hour

Victoria Kalmykova (she/her)	She is expected to testify about Defendants' knowledge of Ms. Sperry's prior misconduct; about how Ms. Sperry targeted her in the exact same ways as she targeted Plaintiff; about how she was willing to provide additional information to Defendants in connection with the events involving Plaintiff, but Defendants never contacted her; and about other potential issues.	1 hour
Liz Cooper (she/her)	She is expected to testify consistently with her deposition	1 hour
Dr. Peter Philips (he/his)	He is expected to testify pursuant to FRE 702 regarding his analysis of Plaintiff's economic damages and costs of mitigation associated with Plaintiff's claims in this case	1.5 hours
Dr. Louise Fitzgerald (she/her)	She is expected to testify pursuant to FRE 702 regarding the emotional and psychological harm and trauma that Defendants' actions caused Plaintiff, about how Defendants' action in this case are contrary to the purposes of Title IX, about the	2 hours

May Call

Melissa Sperry	Consistent with her deposition	2 hours
Susan Walker	Consistent with her deposition	2 hours
Timothy Dailey	Consistent with his deposition	2 hours
Ali Mageehon	Consistent with her deposition	1 hour
Jeff Whitey	Consistent with his deposition	1 hour
Francisco Saldivar	Consistent with his deposition	2 hours
Rod Keller	Consistent with his deposition	1 hour
Robin Finney	Consistent with her deposition	1 hour
Patty Scott	Consistent with her deposition	30 mins
Pam Wick	Consistent with her deposition	30 mins
Any witnesses identified in Defendants' disclosures		

DATED this 19th day of April 2022.

/s/ Brandon J. Mark
 Brandon J. Mark (OSB No. 041613)
 Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on April 19, 2022, I electronically filed the foregoing Plaintiff's Exhibit List with the Clerk of the Court using the CM/ECF system which will send electronic notification to of such filing to all CM/ECF participants.

/s/ Brandon J. Mark _____